

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO**

CARLO R. NUNEZ,

Plaintiff,

v.

Case No. 1:17-CV-00933-JB-LF

UNUM LIFE INSURANCE COMPANY OF  
AMERICA,

Defendant.

**JOINT MOTION TO SEAL ADMINISTRATIVE RECORD**

COMES NOW, Jeffrey B. Diamond, and hereby moves the Court to grant permission to Defendant to lodge the administrative record under permanent seal for the following reasons:

1. The administrative record is exempt from redaction pursuant to Fed. R. Civ. P. 5.2 (b)(2).
2. While public remote access to the record in this case is restricted to the parties pursuant to Fed. R. Civ. P. 5.2(c), any other person may have electronic access to the full record at the courthouse . . . pursuant to Fed. R. Civ. P. 5.2(c)(2).
3. The administrative record contains Plaintiff's medical records, hence there are large amounts of sensitive personal and health related information throughout the record.
4. Redacting the record would obscure the Court's view from a large portion of pertinent information in the record.
5. Counsel for Defendant concurs with the filing of this motion.

Respectfully submitted,

JEFF DIAMOND LAW FIRM

By: s/ Jeffrey B. Diamond  
Jeffrey B. Diamond  
Attorneys for Plaintiff Carlo R. Nunez  
P. O. Box 1866  
Carlsbad, NM 88221-1866  
Tel: (575) 885-3500  
[jdiamond@jeffdiamondlawfirm.com](mailto:jdiamond@jeffdiamondlawfirm.com)

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: s/ Nicole M. True  
Stephen M. Bressler  
Nicole M. True  
Attorneys for Defendant Unum Life  
Insurance Company of America  
201 East Washington Street, Suite 1200  
Phoenix, AZ 85004  
Tel: (602) 262-5389  
[sbressler@lrrc.com](mailto:sbressler@lrrc.com)  
[ntrue@lrrc.com](mailto:ntrue@lrrc.com)